

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PATELUNAS TO INTERROGATORY OF  
AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF  
PRESORT MAILERS REDIRECTED FROM WITNESS KINGSLEY  
(ABA&NAPM/USPS-T39-8)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of American Bankers Association and National Association of Presort Mailers: ABA&NAPM/USPS-T39-8, filed on November 15, 2001 and redirected from witness Kingsley.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking:



Susan M. Duchek

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November 29, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PATELUNAS TO INTERROGATORIES OF  
AMERICAN BANKERS ASSOCIATION AND  
NATIONAL ASSOCIATION OF PRESORT MAILERS  
(REDIRECTED FROM WITNESS KINGSLEY)**

**ABANAPM/USPS-T39-8.** At page 9, lines 1 – 15, of your testimony USPS-T-39 you mention that Postal Automated Redirection System (PARS) will be implemented in early CY 2003.

- (a) Have the cost saving effects of PARS been included in the USPS projections of UAA costs?
- (b) What cost savings does USPS expect from implementation of PARS?

**Response:**

- (a & b) Yes. Please refer to USPS-LR-J-49, Exhibit E, page 1 that shows Test Year 2003 PARS savings of \$81,478,000.

**DECLARATION**

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 11/29/01

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Susan M. Duchek

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